

BLM_NV_NVSO_GWProjects

From: William Wilson <billandholly665@att.net>
Sent: Tuesday, October 11, 2011 4:20 PM
To: BLM_NV_NVSO_GWProjects
Subject: Comments
Attachments: DEIS_Pipeline comments.docx

Dir Sir:

Attached are our comments on the Groundwater Pumping Draft EIS. Thank you for your consideration.

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Section 1.6.1

SNWA's need for the proposed action is out of date. The 2008CBER population forecast is no longer applicable since the perceived population boom is now a bust trend. SNWA needs to submit more than conjecture that the need still exists. Section 3.18 needs to be updated to reflect this reversal.

SNWA's plight is depicted by the lowering of Colorado River inflow. There are many other alternatives available to help satisfy their water concerns, but none have been presented as alternatives in conjunction with the proposed action.

There needs to be an economic analysis to determine the cost to SNWA, rate payers, the BLM and SE. This should be compared to alternative solutions.

Neither SNWA nor the EIS recognizes that the oncoming drought, so potentially devastating to SNWA is also the same drought which would decrease recharge to the affected basins and exacerbate the damage documented in this EIS. Recharge in drought years may be insufficient to ensure that sufficient pipeline water would be available for SNWA's needs.

Section 2.1

Alternatives A, B, C, D, and E are at best variations on a theme. These are apparently sized according to guesses as to how much water the State Engineer will allocate. Lower pumping rates would basically just prolong the time before the aquifers are depleted and ultimate environmental damage is achieved. Surface disturbance and reclamation would be essentially the same. It is hard to call these "Alternatives".

Section 3.20-2

Like a bad disease, monitoring will likely not show the need for mitigation until the damage is far along and irreversible. Can the EIS somehow rate the effectiveness of each of the mitigation measures as to what damage would occur on a proposed monitoring schedule? How will the BLM and the SE coordinate and enforce compliance?